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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

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July 27, 2015

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Attn: Title V Reports

Re: Semiannual Monitoring Report for Facility No. A0733

As required by Section I Part F of the subject Title V permit, the City of Sunnyvale Water Pollution Control Plant (Facility No. A0733) is submitting this Semiannual Monitoring Report for the period from January 1, 2015 through June 30, 2015. After reasonable inquiry, we conclude the following regarding this period of operation:

- There were no deviations during this period;
- There were no excess emissions;
- All reports were submitted on time;
- All CEM QA procedures, methodologies, and maintenance were performed as required.

The monitoring required by this permit and the monitoring results are summarized below:

PGF Heat Input Limits Monitoring [Condition 10844 (2)]:

S-14 and S-15 gas throughput for each fuel type is monitored continuously at five second intervals on a daily basis, well in compliance with the required 15-minute interval. Monthly samples are collected from each fuel stream and analyzed for the high-heat value, which is used with the gas throughput to calculate the daily and consecutive 12-month total heat inputs to each engine. All calculated values were in compliance with the permitted limits of 200 MMBTU daily and 72,000 MMBTU monthly over the entire reporting period.

PGF Annual Source Test [Condition 10844 (4, 6)]:

The Annual Source Test for S-14 and S-15 was conducted on January 22, 2015. Analytical results were submitted to your office on February 13, 2015. All results were in compliance with the emission limits and regulations specified in the permit.

Landfill Gas Component System Leak Testing [8-34-301.2]:

First and Second Quarter monitoring events were conducted on February 28 and June 20 to identify any presence of organic compound concentrations above the permit limit of 1,000 ppmv, measured as methane, associated with the landfill gas system components on the facility. During the first quarter

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monitoring event, component/leak emissions testing of the LFG conveyance piping was performed and detected methane gas concentration up to 5,000 ppmv at the PGF Blower No. 2 outlet flex coupling. Corrective actions were implemented by City personnel and follow-up testing performed on March 6, 2015, indicated the area had returned to below compliance limits within 7-days following the leak detection. No other compliance issues were detected during the reporting period.

Landfill Gas Emission Control System [8-34-113.2]:

During the reporting period, the LFG emission control system was in compliance with the shutdown time limitation of ≤ 240 hours/year.

Sulfur Compounds Monitoring [Condition 19978 (2)]:

Total reduced sulfur compounds in the digester gas used to operate S-16, S-17, and S-18 are monitored quarterly. The results provided following table demonstrate compliance with the 1,550 ppmvd limit:

| Total Reduced Sulfur Compounds – Draeger Tube Test results | | | | |
|--|--------------|-------------|-------------------|-----------------|
| Sources: S-16, 17 & 18 | Date of Test | Requirement | Result ppmv (dry) | Compliant (Y/N) |
| First Quarter Sampling: | | | | |
| Digester Gas | 1/7/2015 | 19978 (2) | 700 | Y |
| Second Quarter Sampling: | | | | |
| Digester Gas | 4/29/2015 | 19978 (2) | 800 | Y |

Emergency Blackstart Generator Reliability-Related Activities [Condition 19929 (3)]:

During the reporting period, reliability-related activities performed on the emergency blackstart generator (S-19) were in compliance with the limitation of ≤ 100 hours/year.

I am the responsible person for the City of Sunnyvale Water Pollution Control Plant, and I certify that this report is true, accurate, and complete.

Please contact Melody Tovar at (408) 730-7808 if you have any questions or comments on this report.

Sincerely,



John Stufflebean
Director, Environmental Services Department

cc: Simon P. Margolis, BAAQMD – email